

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
IN ADMIRALTY

Carver Stevedoring Services,)
Inc.,)
)
Plaintiff,)
)
vs.) Civil Action 2:20-cv-01344-DCN
)
M/V NAVIOS CHRISTINE B (IMO No.)
9496238), her engines, boilers,))
tackle, appurtenances, etc.,)
in rem, and Imba maritime,)
S.A., Coasters Ventures, Ltd.,)
and Navios Maritime Partners,)
L.P., in personam,)
)
Defendants.)
)
)
)
) (NON-JURY)

ATTORNEY AFFIDAVIT FOR RULE B ATTACHMENT

Pursuant to 28 U.S.C. § 1746, I, Albert G. Bilbrey, Jr., Esq.,
declare under penalty of perjury that the following is true and
correct:

1. I am an attorney with Cooper & Bilbrey, P.C. and I am counsel
of record for Plaintiff Carver Stevedoring Services, Inc.
(hereinafter "Plaintiff" or "Carver").
2. I am admitted to practice before this Honorable Court. The
facts stated in this affidavit are within my personal
knowledge and are true and correct.
3. On behalf of Plaintiff I filed a verified complaint containing

a prayer for process to attach Defendant's vessel M/V NAVIOS
CHRISTINE B (IMO No. 9496238).

4. After a diligent search I could not locate the *in personam*
Defendants in this district.

5. Upon information and belief, the *in personam* Defendants are
foreign corporations with foreign addresses and cannot be
found within the district.

I declare under penalty of perjury that the foregoing is true
and correct.

Dated: April 8, 2020
Mount Pleasant, South Carolina

s/ Albert G. Bilbrey, Jr.
Albert G. Bilbrey, Jr.